

## Vanlerberghe, Daren

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**From:** Hughes, Matt [mhughes@WM.COM]  
**Sent:** Monday, July 07, 2014 12:57 PM  
**To:** Vanlerberghe, Daren  
**Cc:** Lucier, Eric; Grady, Mark; Gosine, Jairaj; Connolly, James  
**Subject:** Wheelabrator Saugus  
**Attachments:** Cooling Water pH Log Book Page 7-2-14.PDF; Revised Fish Log 7-2-14.PDF; NPDES Permit Sampling Procedures.docx

Daren:

As follow up from your site visit last week. The facility has implemented the suggestions you had with regards to pH measurement on the once through cooling water, and pH monitoring at the fish return for Outfall 002. Note that the sample collection time and pH measurement time have been added to the forms. The sampling procedures have also been revised, these are attached as well.

I have also reached out to the industrial wastewater sampling contractor to discuss the other suggestions you had regarding the sample chain of custody and oil & grease sample collection. Once I close the loop on these items I will send you another update.

If you have any questions or comments on these items, please let me know.

Thanks.

**Matt Hughes**

Regional Environmental Manager-MA/NH

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CALIBRATED PH METER

4 . 7 . 10 GOOD (ESK)

TESTER &amp; SAMPLER (ESK)

BUFFER EXPIRATION DATES

4<sup>9/11</sup> 7<sup>9/15</sup> 10<sup>10/15</sup>RIVER H<sub>2</sub>O OUTLET PH 2.68

(ESK)

GRAIB SAMPLE TAKEN @ 0815

PH READING TAKEN @ 0819

(ESK)

(LTC)

**Wheelabrator Saugus Inc.**  
**Outfall 002 (Traveling Screen Water Wash)**  
**Round Sheet/Log**

**Instructions:**

1. Inspect Screen Every 12-hrs. for the following parameters; Completely fill out the following information each inspection/round
2. Inspection shall start at the beginning of the 15 minute screen rotation period and continue for at least 1 full rotation
3. Inspect the traveling screens ONLY for fish for 15-minutes.
3. a. If less than 7 fish are observed on the screens, return the contents of the nets into the trough
3. b. If more than 7 fish are observed on the screens, empty the nets into the 5-gallon bucket to capture fish observed on the screens and notify SS
4. During the first week of every month on Wednesday, obtain a grab sample and record pH. Record sample collection time and pH measurement time below.

Day Shift (5:30AM - 5:30PM)				Night Shift (5:30PM - 5:30AM)							
Instructions Reviewed (Y or N)	Date	Time	# of Fish Live (if any)	# of Fish Dead (if any)	RW Pumps in Operation (Y or N)	> 7 Fish / observation, notify EH&S/SS (Y/N) **	*** Water Discoloration (Y/N)	*** Oil Sheen (Y/N)	*** Foam (Y/N)	*** Floating Solids (Y/N)	pH (if needed / required)
Yes	7/2/14	0715	1	0	Yes	No	No	No	No	No	7.73

Operator (Print): Edward S. Hawa Supervisor (Print): Leonard Chesky

Operator (Signature): [Signature] Supervisor (Signature): [Signature]

\* EH&S/Management reports such occurrence to the Regional Administrator and the Commissioner within 24 hours by telephone

\*\* 24-hr notification and a written confirmation report is to be provided within five (5) business days.

\*\*\* Note: 25 or more dead and live fish estimated based on time line observations (i.e. 6.2 or more)

Monthly pH Sample

Wheelabrator Saugus, Inc.  
Saugus, Inc.

pH sample collection time: 0925

pH measurement time: 0933

[Signature]

Rev. Date: 7/1/2014

**NPDES Permit MA0028193**

**Procedure for collecting weekly pH grab sample.**

1. Obtain clean plastic bottle for sample collection
2. Open valve on inlet or outlet of condenser (depending on which type of sample is being collected)
3. Open valve slowly to allow for sample to be collected.
  - a. If no sample is available due to a vacuum created by the velocity of the water, utilize the local pump to collect the sample.
  - b. Fill sample container with adequate amount of sample for analysis.
  - c. Note the time the sample was collected.
4. Bring the sample to the Water Lab.
5. Calibrate the pH meter prior to use (4, 7, 10). Note calibration in logbook.
6. Take pH measurement of sample.
7. Record the pH result in the logbook, also note the time the sample was collected and the pH measurement taken. pH MEASUREMENT MUST BE COMPLETED WITHIN 15 MINUTES OF SAMPLE COLLECTION.

**NPDES Permit MA0028193**

**Procedure for collecting monthly Outfall 002 outlet pH grab sample.**

1. Obtain clean plastic bottle for sample collection.
2. Submerge bottle in fish return outlet, east side of #2 Travelling Screen.
  - a. Fill sample container with adequate amount of sample for analysis.
  - b. Note the time the sample was collected.
3. Bring the sample to the Water Lab.
4. Calibrate the pH meter prior to use (4, 7, 10). Note calibration in logbook.
5. Take pH measurement of sample.
6. Record the pH result on the Travelling Screen inspection form, also note the time the sample was collected and the pH measurement taken. pH MEASUREMENT MUST BE COMPLETED WITHIN 15 MINUTES OF SAMPLE COLLECTION.

**From:** [Hughes, Matt](#)  
**To:** [Vanlerberghe, Daren](#)  
**Cc:** [Connolly, James](#); [Gosine, Jairaj](#); [Lucier, Eric](#); [Grady, Mark](#)  
**Subject:** RE: Wheelabrator Saugus  
**Date:** Tuesday, August 26, 2014 2:41:48 PM

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Daren:

As follow up to your email earlier this month. The attached picture shows how this information will be collected in the sampling log book for river water pH monitoring. The same format would be used for Outfall 001 and 002.

Any questions on this, please let me know.

Thanks.

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**From:** Vanlerberghe, Daren [mailto:Vanlerberghe.Daren@epa.gov]  
**Sent:** Saturday, August 16, 2014 12:17  
**To:** Hughes, Matt  
**Cc:** Connolly, James; Gosine, Jairaj; Lucier, Eric; Grady, Mark  
**Subject:** RE: Wheelabrator Saugus

Matt,

Great, thanks for the update. The inspection report is still in draft, so this will get reflected in the report.

I did have one follow-up question regarding the issue with the monitoring records requirements for the river water outfalls (NPDES Permit MA0028193, outfalls 001 and 002). As you recall, we discussed the requirement to include the time of sample collection. In addition, there is a requirement to include the analytical techniques or methods used in the monitoring records. This is in regard to the pH samples at outfalls 001 and 002. I do not see the analytical techniques or methods used included with any of those monitoring records. Below is the monitoring records requirement from Part II.C.1.c. of the NPDES Part II Standard Conditions (attached).

c. Records of monitoring information shall include:

- (1) The date, exact place, and time of sampling or measurements;
- (2) The individual(s) who performed the sampling or measurements;
- (3) The date(s) analyses were performed;
- (4) The individual(s) who performed the analyses;
- (5) **The analytical techniques or methods used;** and
- (6) The results of such analyses.

Basically, you should ensure that all of the above items are included with NPDES permit monitoring records. Let me know if you have any questions. Thanks

Daren Vanlerberghe

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303-462-9261

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**From:** Hughes, Matt [<mailto:mhughes@WM.COM>]  
**Sent:** Monday, August 11, 2014 5:57 AM  
**To:** Vanlerberghe, Daren  
**Cc:** Connolly, James; Gosine, Jairaj; Lucier, Eric; Grady, Mark  
**Subject:** Wheelabrator Saugus

Daren:

This is probably the last item you had discussed with us during the inspection in June. At the inbound scale an asphalt berm has been installed to prevent spills from sheet flowing off into the wetland. The length of the berm was arrived at looking at the surface elevations and evaluating flow directions. During the inspection you had raised concerns about spills, and the potential to impact the adjacent wetland. The berm serves as a barrier to control these situations.

Let me know if you have any questions on this.

Thanks.

**Matt Hughes**  
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EXAMPLE DAY

Calibrate pH Meter

Buffer  
ACTUAL  
SLOPE

4

4.01

7

7.00

XX.X%

10

10.00

(EXAMPLE; MUST BE w/in  
0.05 SU)

Tester/SAMPLER

INITIAL

Buffer EXPIRATION DATES

4 DATE

7 DATE

10 DATE

①

River H<sub>2</sub>O Outlet pH = X.XX

INITIAL

River H<sub>2</sub>O Outlet Sample Temperature = XX °C

②

River H<sub>2</sub>O Outlet pH = X.XX

INITIAL

River H<sub>2</sub>O Outlet Sample Temperature = XX °C

NOTE: PER EPA METHOD #150.1 successive volumes of sample must  
be measured w/ a difference of < 0.1 units.  
SAMPLE TEMPERATURE must also be recorded.

Grab Sample taken @ XX:XX

pH reading 1 taken @ XX:XX

pH reading 2 taken @ XX:XX